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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARK MANIBUSAN,

Plaintiff,

v.

NEVADA DEPARTMENT OF
CORRECTIONS, et al.,

Defendants.

Case No. 3:17-cv-00303-MMD-CLB

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE REPLY
IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
(FIRST REQUEST)**

Pursuant to Local Rule 26-4, Defendants, Renee Baker, Dwayne Baze, Tara Carpenter, James G. Cox, James Dzurenda and Ronda Larsen, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and John C. Dorame, Deputy Attorney General, and Plaintiff Mark Manibusan, by and through his counsel, Robert L. Langford, Esq., and Matthew J. Rashbrook, Esq., respectfully submit the following Stipulation and Order to Extend Deadline to File Reply in Support of Defendants' Motion for Summary Judgment. This Stipulation is the first request for such an extension and is entered by the parties in good faith and not for the purpose of delay.

A. Reasons why the Deadlines Were not Satisfied

Due to an unexpected increase in defense counsel's case load, which case have need immediate and substantial attention since the filing of Plaintiff's Opposition to Defendants' Motion for Summary Judgment, as well as other dispositive motion deadlines

occurring at or near the same time as the instant matter, defense counsel has been unable to comply with the deadline to file replies, currently set for March 29, 2022. As a result, defense counsel requested, and Plaintiff has graciously stipulated to, a short extension of the reply deadline.

B. Proposed Schedule

The parties propose that the following current deadlines be extended by 10 days:

1. The current deadline for reply briefs is March 29, 2022. The Parties stipulate that deadline be extended to April 8, 2022.

For the foregoing reasons, the NDOC Defendants and Plaintiff Mark Manibusan hereby stipulate to the above extensions.

DATED this 28th day of March, 2022.

ROBERT L. LANGFORD & ASSOCIATES

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By: /s/ Matthew J. Rashbrook
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ORDER

Based on the foregoing stipulation of the parties, the deadline to file a Reply in Support of Defendants' Motion for Summary Judgment shall be extended as described.

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

This 28th day of March, 2022.

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on March 28, 2022, I electronically filed the foregoing, **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE REPLY IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**, via this Court's electronic filing system. Parties that are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Carson City, Nevada, addressed to the following:

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